



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

SHARI MEGHREBLIAN, PhD
COMMISSIONER

BILL HASLAM
GOVERNOR

September 20, 2018

Via Electronic Mail to arfarless@tva.gov

Attn: Ashley Farless, NEPA Specialist
Tennessee Valley Authority
1101 Market St., BR2
Chattanooga, TN 37402

Dear Ms. Farless:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) *Draft Supplemental Environmental Assessment* (SEA) for the Bull Run Fossil Plant (BRF) Ash Impoundment Closure project.¹ This Draft SEA has been prepared by TVA to account for changes in the closure plan for the Fly Ash Impoundment and Stilling Pond identified in TVA's previous SEA. Subsequent to the completion of the Programmatic Environment Impact Statement (PEIS), TVA determined that there is a long-term need for wastewater treatment at BRF and revised the closure plan to support the wastewater treatment system at BRF. This site-specific SEA therefore tiers off the programmatic level review provided in Part I, the prior site-specific review of proposed Fly Ash Impoundment closures under Part II of the PEIS (2016), and evaluates a proposed change to the action proposed in the previous site-specific SEA (2017).

Actions considered in detail within the Draft SEA include:

- **Alternative A – No Action Alternative.** Under the No Action Alternative TVA would close the Stilling Pond and Fly Ash Impoundment in place as previously described in the October 2017 SEA. The Stilling Pond and a portion of the Fly Ash Impoundment would be repurposed as Process Water Basins as previously described in the October 2017 SEA.

¹ In June 2016, TVA issued a Final PEIS and Record of Decision that considered alternatives and related environmental impacts associated with closure of ash impoundments across the Valley. In Part II of the PEIS, TVA considered closure of the Bull Run Fossil Plant Sluice Channel and Fly Ash Impoundment which are part of the wet coal combustion residuals (CCR) disposal area at BRF. The preferred closure method was closure in place. In October 2017, TVA released a Final SEA and Finding of No Significant Impact (FONSI). These documents studied a larger area than the originally proposed impoundment closure as well as repurposing of the Stilling Impoundment for non-CCR wastestreams. The preferred closure method was closure in place. A portion of the Fly Ash Impoundment would also be closed in place and repurposed as a Process Water Basin for wastewater treatment.

- **Alternative B – Temporarily Cover a Portion of the Fly Ash Impoundment, Closure-by-Removal of the Remaining Portion of the Fly Ash Impoundment and Repurposing into a Process Water Basin, Closure-by-Removal of the Stilling Pond and Repurposing into a Process Water Basin, and Development of a Process Water Basin Emergency Spillway.**

Under this alternative, TVA proposes to temporarily cover an approximately 20-acre portion of the Fly Ash Impoundment containing approximately 2,900,000 cubic yards (yd³) of CCR materials. The remaining portion (approximately 13 acres) of the Fly Ash Impoundment would be Closed-by Removal with up to an estimated 595,000 yd³ of CCR materials being removed and transported to an on-site landfill. The portion of the Fly Ash Impoundment that is Closed-by-Removal would be repurposed into a Process Water Basin for BRF. In addition, the Stilling Pond would be Closed-by-Removal, which would entail removal and transport of up to an estimated 71,000 yd³ of CCR and residual materials to an existing on-site landfill. The Stilling Pond would be repurposed as a Process Water Basin. Once constructed, the Process Water Basins would only manage storm water and non-CCR wastewater from BRF facilities.²

For the temporarily covered portion of the Fly Ash Impoundment, if the CCR materials are suitable for regrading and consolidation, they would remain in the impoundment. If they are not suitable for regrading, the material would be removed, dried, and placed in an on-site landfill. In areas where CCR materials are removed and placed in the on-site landfill, suitable fill material may be imported to grade and support the temporary cover system. The temporary cover system in the fly ash pond would be constructed to the same standards as a permanent cover system, as described in Part II of the PEIS. However, the long-term disposition of the cover system would be determined through coordination with TDEC and analyzed in a future environmental review.

As part of the Process Water Basin infrastructure, an emergency spillway would be constructed along the western side of the perimeter dike that borders the Stilling Pond. The emergency spillway would be created by modifying a section of the existing perimeter dike to have a lower elevation. The spillway would be armored with rip rap, concrete, or a combination of the two on the top and outside slope. Laydown areas would be the same as that described in Part II of the PEIS (2016) and the prior SEA (2017).

TDEC has reviewed the Draft SEA and has the following comments regarding the proposed action and its alternatives:

Solid Waste

Page 7, Section 2.1.2 of the Draft SEA describes the removal of a total of 666,000 yd³ of CCR which will be removed and transported to the on-site landfill. TDEC encourages TVA to include additional discussion in the Final SEA relating to how the addition of this material will reduce the remaining life of the on-site landfill; how this additional material will affect the timeline for permitting of the Site J

² Generalized construction steps for this project include dewatering the Stilling Pond and Fly Ash Impoundment and removal of CCR materials from the Stilling Pond and the Closed-by-Removal portion of the Fly Ash Impoundment. Handling of wet material would occur inside the footprint of the current Fly Ash Impoundment and Stilling Pond. The material would be handled and dried, and once dry, it would be disposed of in the on-site landfill.

Landfill; how materials removed from the Fly Ash Impoundment and Stilling Pond will affect the stability of the landfill; how TVA will manage the wastes in the event these materials do not meet the performance standards of waste currently permitted to be placed in the landfill; and how TVA plans to further process the material to meet the stability standards for which the facility was permitted.

Water Resources

Based on Alternative B of the Draft SEA modifications would need to be made to TVA BRF's existing NPDES Multi-Sector General Stormwater Permit's Storm Water Pollution Prevention Plan (SWPPP) to reflect the changing conditions. An NPDES Construction Stormwater Permit for stormwater runoff from construction activities will also be required. TDEC recommends TVA include these considerations in the Final SEA.

TDEC appreciates the opportunity to comment on this Draft SEA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



Kendra Abkowitz, PhD

Assistant Commissioner, Office of Policy and Sustainable Practices

Tennessee Department of Environment and Conservation

Kendra.Abkowitz@tn.gov

(615) 532-8689

cc: Daniel Brock, TDEC, DOA
Lacey Hardin, TDEC, APC
Chuck Head, TDEC, BOE
Lisa Hughey, TDEC, DSWM
Tom Moss, TDEC, DWR
Joseph Sanders, TDEC, OGC
Robert Wilkinson, TDEC, BOE
Stephanie Williams, TDEC, DNA